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VIA ECF & FACSIMILE (212-805-7986)

May 4, 2018

The Honorable Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 705
New York, NY 10007

Re: Request to Appear by Telephone for Initial Conference
Alfredo Cruz Sanchez, et al. v. Rainbow Umbrella, et al.
Case No.: 17 Civ. 9065 (PGG)

Dear Justice Gardephe:

As you know, we recently were substituted in as counsel for Defendant Peter Schatzberg in the above-referenced action. We write to request that the Court allow our office to appear for the initial conference by telephone.

On May 17, 2018, there is an initial conference scheduled in this matter before Your Honor. We request that this Court allow us to appear for the initial conference via telephone. Our law firm's headquarters, where my office is located, is in Buffalo, New York, which is approximately 400 miles away from Chambers. It would be a great financial burden on our client for us to have to personally appear at this juncture, and we can zealously represent his interests through our presence on the telephone.

All counsel have consented to this request. Please feel free contact us if you have any questions or instructions in this regard.

Respectfully submitted,

LIPPES MATHIAS WEXLER FRIEDMAN LLP

By:

A handwritten signature in blue ink that reads 'Vincent M. Miranda'.

Vincent M. Miranda

Vincent M. Miranda | Senior Associate | vmiranda@lippes.com

New York: Albany, Buffalo, New York City • Florida: Ponte Vedra Beach • Ontario: Greater Toronto Area



cc: Joseph D. Lockinger, Esq.
Colin James Mulholland, Esq.